

# TEXAS DEPARTMENT OF AGRICULTURE

TODD STAPLES  
COMMISSIONER

October 20, 2011

Mr. T.D. Searles, President  
American Lumber Standard Committee  
P.O. Box 210  
Germantown, MD 20875-0210  
Delivered via email

Dear Mr. Searles:

Thank you for the work you and the American Lumber Standard Committee (ALSC) do to maintain the high quality and standard of American forestry products.

It is my understanding the ALSC may consider revisions to the design value standards associated with Southern Pine. The Texas forest products industry is greatly concerned the revision could result in a significant downgrade of the design value for Southern Pine. As you know, Texas is a major producer of Southern Pine, harvesting 386 million cubic feet in 2010, valued at more than \$551 million. The Texas forest sector has a total economic impact of nearly \$34 billion and employs more than 78,350 people directly, with nearly 88,000 in additional indirect employment. An overwhelming majority of production occurs in the eastern region of the state; therefore, East Texas would be devastated if the standard revisions created impediments to the sale and use of Southern Pine.

In light of the overwhelming economic importance of this industry and the substantial nature of the recommendation, I ask that you strongly consider delaying action to allow for a more extensive review and an independent study conducted by USDA's Forest Products Laboratory. This study should also identify documented cases to support appropriate design value revisions and identify phase-in strategies should any changes be recommended.

I share your commitment to safety, as do all of Texas' Southern Pine producers. We want to ensure that the market is not disrupted in such a way that calls into question the standard and quality of a product without extensive testing and proof of failure. I look forward to the committee's decision and hope our work can mutually benefit the American lumber industry.

Sincerely yours,



Todd Staples

TS/JM/jm

